

**FILED**

NOV 05 2018

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

CLERK U.S. DISTRICT COURT  
WEST. DIST. OF PENNSYLVANIA

UNITED STATES OF AMERICA                     )  
   )  
   )     Criminal No. 18-292  
   )     (UNDER SEAL)  
ROBERT BOWERS                                     )

**UNOPPOSED MOTION FOR FILING OF REDACTED INDICTMENT**

AND NOW comes the United States of America, by its attorneys, Scott W. Brady, United States Attorney for the Western District of Pennsylvania, and Troy Rivetti and Soo C. Song, Assistant United States Attorneys for said district, and respectfully moves for permission to file a redacted Indictment. In support thereof, it is respectfully averred:

1. On October 27, 2018, the defendant, Robert Bowers, drove to the Tree of Life Synagogue and entered the building carrying multiple firearms. When the defendant, ROBERT BOWERS, entered the Tree of Life Synagogue and opened fire, killing and injuring members of the Tree of Life, Dor Hadash, and New Light congregations. While inside the Tree of Life Synagogue, the defendant made statements indicating his desire to “kill Jews.” Law enforcement officers responded to the scene and the defendant also opened fire upon them, injuring four public safety officers. Doc. No. 1 at 1.

2. The defendant surrendered and was arrested at the scene.

3. Later that day, a criminal complaint was sworn out against BOWERS, charging him with a total of twenty-nine (29) counts, in violation of 18 U.S.C. §§ 247 and 924. Mag. No. 18-1396, Doc. No. 1.

4. The defendant’s initial appearance was held on October 29, 2018, at 1:30 pm before the Honorable Judge Robert Mitchell. The government requested that the defendant be detained and the defendant waived a detention hearing. Mag. No. 18-1396, Doc. Nos. 3 and 8.

5. On October 31, 2018, the defendant was indicted by a federal grand jury sitting in the Western District of Pennsylvania and was charged with forty-four counts of civil rights and firearms offenses. Doc. No. 1.

6. The defendant was arraigned on November 1. As noted at arraignment, the government will provide discovery pursuant to Local Rule 16. In addition, the government anticipates that, following its Rule 16 disclosure, additional discovery may be requested and may be disclosed.

7. Because of the nature of the allegations in this case (in particular, that the defendant shot, killed and injured civilians and due to the sensitive nature of much of the Rule 16 Materials (including autopsy and serology reports), the government has concerns about disclosing the name of the grand jury foreperson into the public realm.

8. As a result, the government is requesting an order directing the Clerk of Court to replace the filed copy of the Indictment with a copy in which the foreperson's name has been redacted. The government has conferred with counsel for the defendant and this motion is unopposed.

WHEREFORE, the United States of America respectfully requests that the Court issue an Order allowing the government to file a redacted copy of the Indictment in this matter. A proposed order is attached.

Respectfully submitted,

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United States Attorney

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